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COMMISSION  
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Allan G. Donn  
(757) 628-5521  
adonn@wilsav.com

June 21, 2016

CELA

Via Email

Federal Election Commission  
General Counsel's Office  
Office of Complaints Examination and Legal Administration  
Attn: Mary Beth deBeau, Paralegal  
999 E. Street, NW  
Washington DC 20436

Re: MUR 7084

Dear Ms. deBeau

I enclose Statement of Designation of Counsel authorizing me to represent Richard D. Roberts in the matter set forth in your June 15, 2016 letter to him.

The Complaint dated June 6, 2016 filed by Lisa Clarkson identified Mr. Roberts on page 3 as being a federal government contractor based upon a designation of Mr. Roberts as "Executive Norfolk Southern" in the report filed with the Commission.

Mr. Roberts is not now, nor has he ever been, an Executive of Norfolk Southern Corporation. He has been a retired business man for a number of years.

I have spoken this morning with John G. Selph, identified as Treasurer in the caption of the June 6, 2016 Complaint letter of Lisa Clarkson, and he told me that he will correct the report to delete the erroneous designation of Mr. Roberts as a Norfolk Southern executive. Your letter states, "Where appropriate, statements should be submitted under oath by persons with relevant knowledge." I assume that the correction of the error will not require a statement under oath by Mr. Roberts.

Based upon the corrected information, I request that you find no reason to believe that the Complaint sets forth a possible violation of the Act by Mr. Roberts, that no action should be taken against him in response to the Complaint, and that the file be closed as to him.

Reply to Norfolk Office

440 MONTIDELLO AVENUE SUITE 2200 NORFOLK, VA 23510 757.628.5500 FACSIMILE 757.628.5566  
222 CENTRAL PARK AVENUE SUITE 1500 VIRGINIA BEACH, VIRGINIA 23462 757.628.5600 FACSIMILE 757.628.5659

WWW.WILCOXANDSAVAGE.COM

1-1416573.1

Willcox & Savage

June 21, 2016

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Please let me know if I can provide you with any additional information. If not, please advise me that the Commission will close the file as to Mr. Roberts.

Thank you for your attention to this matter.

Sincerely yours,

Allan G. Donn

AGD:seh

Enclosure

cc: John G. Selph, Esq., w/encl.  
Mr. Richard D. Roberts



FEDERAL ELECTION COMMISSION  
999 E Street, NW  
Washington, DC 20463

# STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

FAX 202-219-3923

MUR # 7084

Name of Counsel: Allan G. Donn

Firm: Willcox & Savage, P.C.

Address: 440 Monticello Avenue, Suite 2200

Norfolk VA 23510

Telephone: 757-628-5521

Fax: 757-333-3521

E-mail: adonn@wilsav.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/21/2016  
Date

Richard D. Roberts  
Signature (Respondent/Agent)

Mr.  
Title

**RESPONDENT:** Richard D. Roberts

(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: \_\_\_\_\_  
(Please Print)

Virginia Beach VA 23451

Telephone (H): \_\_\_\_\_

(W): \_\_\_\_\_

E-mail: \_\_\_\_\_

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.